## WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065 TELEPHONE: (310) 589-3230 FAX: (310) 589-2408

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September 6, 2007

Mr. Steve Nix, Assistant City Engineer City of Chino Hills Public Works Department 2001 Grand Avenue Chino Hills, California 91709

City of Chino Hills Proposed Water, Recycled Water & Wastewater Master Plan Program Draft Environmental Impact Report

Dear Mr. Nix:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the City of Chino Hills Proposed Water, Recycled Water & Wastewater Master Plan Program Draft Environmental Impact Report (Program DEIR). The Program DEIR (p. 1-1) states that this is a conceptual study with planning-level descriptions of the size, locations and alignments of water, recycled water, and sewer improvements, but does not provide specific siting, engineering, or design details for individual project activities. While it is understood that additional detail will come later for individual projects when they are proposed later, WCCA is concerned that there is not sufficient amount of information in the Program DEIR to allow the public to conduct a meaningful review and provide meaningful comments.

The Program DEIR states that it is providing locations of where certain facilities would be, without giving the public enough information to adequately understand the environmental impacts. The problem is that later when a specific project is analyzed in a project-level California Environmental Quality Act analysis, if it becomes clear that there will a significant environmental impact, the location will have already been predetermined in the Program DEIR with a minimal environmental review. There are some project elements that should be explained further in the text of the Final Program EIR and/or where better graphics should be provided.

For example, the text (p. 3-3) states that seven new reservoirs are proposed. However, it is difficult from the Exhibit 4 (Proposed Water System) and Exhibit 6 (Proposed Recycled Water System) to determine definitively the proposed location of those reservoirs. We could find three proposed reservoirs and two reservoir replacements on Exhibit 4 and perhaps three or five on Exhibit 6. Also, it is not possible to read the majority of the text shown within the City's boundaries on Exhibit 4. The text on p. 3-9 states that three new recycled storage reservoirs are

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proposed, and the IEUA is planning to construct reservoirs in the 800 and 900 zones. How many are proposed in the 800 and 900 zones, where are these locations, and is this part of the project?

The Biological Resources section (p. 4-3.10) states that Soquel, Carbon, and Tonner Canyons represent significant wildlife movement corridors, as well as the Chino Hills State Park. A number of projects recommended in the Draft Master Plan would enter into these areas, particularly Carbon Canyon, and the northern end of Soquel Canyon (outside of the state park boundaries) (Program DEIR, p. 4-3.10). It also states that project activities such as development of new reservoirs, utility structures, access roads, pipelines, and other improvements could interfere with the movement of native resident or migratory wildlife species (Program DEIR, p. 4-3.11). This leaves the reader guessing as to where the canyons would potentially be affected and whether Chino Hills State Park would be affected.

WCCA recommends that the Final Program EIR include more detailed maps, which can be made fairly easily without excessive time or effort using different layers in Geographic Information Systems (GIS). These layers could include parkland boundaries, rough vegetation mapping (if it exists), topography, aerial photography, identification of environmentally-sensitive canyons (e.g., Carbon Canyon, Soquel Canyon, Tonner Canyon), overlain on the new proposed facilities. The Final EIR should explicitly state whether any of these facilities are proposed in any parks. These figures should clearly show for an average non-engineer public reviewer where the new facilities are proposed. At the very least, zoomed-in figures should show the proposed locations of the new reservoirs and any new accessory roads.

Thank you for your consideration. We would appreciate if you would provide a copy of the Final Program EIR to our staff with at least 10 days for review (prior to the City Planning Commission or Council taking an action on this Master Plan). Please direct any correspondence and questions to Judi Tamasi at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

Bob Henderson Chairperson